

DEPARTMENT OF SOCIAL SERVICES
744 P Street, Sacramento, CA 95814



April 4, 1995

ALL-COUNTY INFORMATION NOTICE I-15-95

TO: ALL COUNTY WELFARE DIRECTORS
ALL COUNTY MENTAL HEALTH DIRECTORS
ALL COUNTY PROBATION OFFICERS
ALL COUNTY AUDITOR CONTROLLERS
ALL COUNTY FISCAL OFFICERS

REASON FOR THIS TRANSMITTAL

- ☐ State Law Change
- ☐ Federal Law or Regulation Change
- ☐ Court Order or Settlement Agreement
- ☐ Clarification Requested by One or More Counties
- ☒ Initiated by CDSS

SUBJECT: EMERGENCY ASSISTANCE (EA) - POLICY CHANGES AND CLARIFICATIONS AND ASSISTANCE TO CHILDREN IN EMERGENCY (ACE) STATEWIDE TRACKING SYSTEM - QUESTIONS AND ANSWERS

REFERENCES: ALL COUNTY LETTERS (ACL) 94-89, 94-90 and 95-06.
ALL COUNTY INFORMATION NOTICES (ACIN) I-16-94, I-18-94, I-01-95 and I-04-95.

The purpose of this letter is to transmit a series of questions and answers addressing issues that arose during statewide training on the Emergency Assistance program (EA) policy changes and clarifications and the Assistance to Children in Emergency (ACE) statewide tracking system. This training was conducted by the California Department of Social Services (CDSS) during the first two weeks of September 1994.

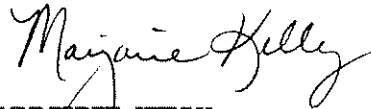
EA is a federally funded program under Title IV-A of the Social Security Act. Phase 1 was implemented July 1, 1993, and focused on county probation assistance and/or services, including juvenile assessment centers, foster care for wards and after care services. Phase 2 was implemented September 1, 1993, and focused on child welfare activities, including emergency shelter care, foster care for dependents and voluntary placements. Phase 3 was implemented August 1, 1994, and expands the scope of assistance and/or services available to the EA child welfare services population, including emergency response and crisis resolution services, and will add an EA program component in the area of mental health upon the execution of the Memorandum of Understanding between the CDSS and the California Consortium of Mental Health Departments (CCMHD) and the approval of an amendment to the Title IV-A State Plan.

The CDSS would like to thank the counties for their positive contribution to the training and for their cooperation in sharing their questions, concerns and expertise.

Questions are grouped by subject. The material has been paraphrased to eliminate references to specific counties. Every effort has been made to include every question asked. The subject categories are:

- o Application Questions
- o Eligibility Questions
- o Service/Case Plan Questions
- o Statistical Reporting Questions
- o Resource Information Questions
- o ACE Enhancement Questions
- o ACE Equipment and Access Questions
- o ACE Report Questions
- o ACE and Social Security Number Questions

Should you have comments of questions regarding this material or further questions regarding the EA program, please contact Ms. Nancy Stone, Manager of the Emergency Assistance Policy Unit, at (916) 445-2890 or FAX at (916) 445-2836.



MARJORIE KELLY
Deputy Director
Children and Family Services Division

Attachment

Attachment

California Department of Social Services
Child Welfare Services Bureau

Title IV-A Emergency Assistance (EA)
Questions and Answers

Application Questions

1. Q. Regarding application processing for EA Probation, it seems that the 30-day period to take an EA application may begin on the date of removal or the date of a judicial determination. It appears that the most likely start date for this period is the detention hearing. We do not report the detention hearing date. How will ACE track the 30-day period?

A. Regardless of the EA component, the County Worker (CW) is required to take an EA application within 30-calendar days of the originating event of the emergency. For EA Probation, the originating event is the removal of the child. The detention hearing validates the removal, but does not affect the date of the originating event. Thus, the date to be entered into ACE is the date of removal.
2. Q. What should a county do when an application for EA is taken, but not within the required 30 days from the date of the originating event of the emergency?

A. An EA application taken after 30-calendar days from the originating event of the emergency must be denied.
3. Q. If the eligibility worker (EW) authorizes based on Presumptive Eligibility (PE), what date does the EW enter on the form? Does the EW re-sign? How about the EW supervisor?

A. The date of authorization remains the same whether the authorization is based on PE or final eligibility. The revised EA application (EA1) effective September 19, 1994, provides specific areas for entry of both the date of authorization (EA1 item #11a) and the date of the final eligibility determination (EA1 item #11b). The EW must sign and date to authorize EA, but need not re-sign for any subsequent final eligibility determination. The signature of the EW supervisor is optional. Therefore, counties may set such standards as they wish for this element.

4. Q. If an EA application is authorized using PE, but the emergency ends before final eligibility can be determined, can the county claim the episode?
- A. Yes, presuming that final eligibility is established prior to claiming the episode. There is only one authorization of EA whether the authorization is based on PE or not. If PE is used to authorize an application, then item #11b. on the EA1 must be completed prior to claiming any costs on that episode. In order to claim costs, EA applications must be authorized within the 30-calendar days following the date of application or prior to the end of the emergency, whichever is sooner.
5. Q. Can erroneous denial actions (i.e., a retroactive approval of an EA application denied in error) be performed in EA? How does the 30-calendar day application processing period apply to such corrective actions?
- A. Counties may correct applications denied in error only during the 30-day period following the date of application.
6. Q. The EA policy changes effective September 19, 1994, provide that the EA child is a family of one and that each child can have an EA episode of his/her own. Should a separate application be made for each child in a family, such as siblings removed from the home at the same time? How is the income of the children treated? How does this relate to ACIN I-18-94 question #9, which states that a "household of one" cannot exist in the EA program?
- A. All-County Letter (ACL) 94-90 provides that a "household of one" is now appropriate in EA. Each child must have an EA episode of his/her own. Each child is considered to be in a separate emergency situation and each must have a separate EA application and separate EA episode based on his/her own emergency. Only the child's income is considered when determining EA eligibility for an EA "household of one." Information provided in ACL 94-90 supercedes all previous material (e.g., ACIN I-18-94) issued on related matters.
7. Q. Must a county take an application for each new emergency experienced by the child?
- A. Yes, if a new emergency occurs, an application must be completed.
8. Q. Must a county take a new EA application when the child moves from a juvenile assessment center/residential treatment to a foster care placement?
- A. No, only one EA application per episode needs to be taken for a child. A change in placement would not constitute a new episode.

Eligibility Questions

9. Q. ACL 94-90 provides that the EA child is treated as a family of one. Given this treatment, how can adults also be included for services in order to properly resolve the child's emergency? How must this be documented? Will there be situations in which such adults will receive EA and consume their own eligibility? What would be the effect on the ACE tracking system?
- A. For the EA Probation and EA Child Welfare Services (EA CWS) components, all EA assistance and/or services are provided only to the EA child (i.e., the EA "family" is the same as the EA "child"). For the EA Mental Health (EA MH) component, adults may receive "direct" EA assistance and/or services in order to resolve the emergency of the child. Adults receiving such "direct" EA assistance and/or services in the EA MH component would require a supplemental application and would consume their own eligibility. The CDSS will issue an ACL instructing counties of this policy. This ACL will include a definition of "direct services" (i.e., services that consume an individual's EA eligibility) and instruction on the effect of receipt of such services on an individual's EA eligibility. As part of this effort, the ACE tracking system is being modified to accommodate records for adults whose EA eligibility has been consumed via receipt of EA MH assistance and/or services.
10. Q. In some cases, the date of removal for an EA Probation child comes after the judicial determination requiring removal. How is this handled? We suggest that the reference to the judicial determination be removed for purposes of eligibility for EA Probation.
- A. The originating event for an emergency in EA Probation is the removal of a child from the home for at least 72 hours when the removal is based on a judicial determination. The judicial determination may or may not come before the removal. The 72-hour period need not be continuous - for example, an accumulation of weekend time served would meet the requirement. The date of removal for a case where the 72-hour period is not continuous is the first day of removal. The need for a judicial determination is part of the definition of the EA Probation emergency as stated in the Title IV-A State Plan. Any request to modify the definition of emergency for the EA Probation component should be referred to the your Regional Representative. The Regional Representative will forward it to the Probation Federal Funding Committee for consideration and discussion with the Chief Probation Officers of California (CPOC), the California Consortium of Probation Departments (CCPD) and CDSS. Requests to modify the definition of emergency for the EA CWS component should be referred to the County Welfare Directors Association (CWDA). Requests to modify the definition of emergency for the EA MH component should be referred to the CCMHD.

11. Q. Eligibility Workers (EWs) are not familiar with the term UMDAP (Uniform Method for Determining the Ability to Pay). What is it and what is its effect on EA eligibility?
- A. UMDAP is the prescribed method used in mental health to determine if, and how much, a patient should have to pay for services. This concept is not used in determination of eligibility for EA, but may be used by the County Mental Health Department to determine the net cost of EA services and the amount to be claimed to EA.
12. Q. Does the removal of a child from a foster home qualify as a removal from the home for the purposes of meeting the emergency definition?
- A. No, if the child is residing in a foster home, the child has already been removed from the home and the county, rather than the parent/relative, is responsible for the care and control of the child. This policy applies even if the child has lived with a parent/relative in the prior six months.
13. Q. In addition to the income eligibility criteria shown on the application, it appears that a resource test has been added. ACIN I-16-94 transmitted a copy of the amended regulations for Division 31 of the Manual of Policies and Procedures (MPP). The Handbook Appendix to Section 31-415 [45 Code of Federal Regulations section 233.120.b(ii)] describes an EA eligible child as follows: "Such child is without resources immediately accessible to meet his needs." Can you explain the use of the term "resources" in this citation?
- A. The referenced citation refers to the initial family income test on the EA1 (item #4). No new resource test has been added. The CDSS has administratively defined "without resources immediately accessible" as meaning that the child has annual income equal to or less than 200% of California's median income. This income level will be transmitted annually to counties in writing via an ACIN. For the Probation and CWS components the initial family income test includes only the child's income. For the EA Mental Health (MH) component the income test would include the incomes of the child and all adults receiving EA MH direct services.
14. Q. A child at a juvenile hall, camp or ranch goes home on weekend furlough and commits a crime. The child is returned to confinement. If the child is on EA, does this interrupt the EA episode? If the child is not on EA, does the child qualify based on residing with a parent/relative within the prior six months?
- A. If the child was on EA, the episode is not interrupted. If the child was not on EA, the county must determine whether or not the child lived with a parent/relative within the six months prior to the EA application. If the child was in custody during the entire six-month period, there is no EA eligibility. The furlough time counts as custody time, not time spent living with the parent/relative.

15. Q. Can EA assistance and/or services provided during the 12-month eligibility period be authorized and/or claimed subsequent to the eligibility period?
- A. Authorization of assistance and/or services must take place within 30-calendar days after the date of EA application. Claiming for EA assistance and/or services need not take place during the 12-month EA eligibility period. The Fiscal Policy Bureau controls the timeframes for submitting claims, please direct inquiries regarding EA claiming to the Fiscal Policy Bureau at (916) 657-3440.
16. Q. Is there a requirement that children eligible for EA also apply for Medi-Cal? Are such children automatically eligible for Medi-Cal?
- A. There is no requirement that children eligible for EA apply for Medi-Cal. EA and Medi-Cal are separate programs. Children eligible for EA are not categorically (i.e., automatically) eligible for Medi-Cal. A separate Medi-Cal application is needed and eligibility for Medi-Cal is determined using the applicable Medi-Cal rules.
17. Q. During the ACE training, it was stated that an abatement action cannot be processed on ACE if the Not-to-Exceed (NTE) date is passed. Also discussed was the effect of the new rule that defines the 12-month eligibility period as beginning on the date of EA authorization. How would the following case be processed:
- o 08/24/94 - Child is removed from the home.
EA episode begins.
 - o 09/08/94 - EA application taken.
(CW & Parent/Relative signs)
 - o 10/01/94 - EA authorized.
(EW signs)
 - o 05/21/95 - EA emergency ends and EA
assistance and/or services
are terminated.
 - o 09/15/95 - EA child experiences a new
emergency situation.
 - o 09/16/95 - EA application taken.
(CW & Parent/Relative signs)
 - o 09/30/95 - Not-to-Exceed Date for episode
beginning on 08/24/94.
 - o 10/05/95 - EA authorized for new episode.
(EW signs)

A. The EA episode begins on the date of removal or date of determination of risk and extends 12 months from the date of authorization. A person may only be authorized once in a 12-month continuous period. In the referenced example, potential EA eligibility exists after the expiration of the prior episode (on 09/30/95). EA was authorized on 10/05/95 and assistance and/or services may be claimed back to the beginning of the episode on 09/15/95. The new 12-month period begins 10/05/95 and will end 10/04/96. It is important to note that the above scenario is only possible under the following conditions:

- o Assistance and/or services for the prior episode that began on 08/24/94 were clearly terminated prior to the new emergency;
- o The new episode (beginning 09/15/95) was authorized after the Not-To-Exceed date of the prior episode (09/30/95);
- o All other eligibility and processing criteria are met.

Service/Case Plan Questions

18. Q. What are the essential elements of a service/case plan?

A. Service/case plans are required documents that directly, or through reference to readily available supporting documents, identifies the assistance and/or services which will be provided to resolve the emergency. At a minimum a service/case plan must identify the following elements:

- o the issues that need to be addressed in order to resolve the emergency,
- o the assistance and/or services that need to be provided to address the issues,
- o the goals or next steps that need to be taken to help resolve the emergency,
- o the assistance and/or services actually provided.

19. Q. ACL 94-90 states that "The CW has 30 calendar days from the date of authorization to continue to build the case service plan and/or assessment document." Does this mean that an assessment/service plan still has to be completed and dated within the authorization time period but the CW now has 30-additional days to "refine" it, or does this mean that the assessment/service plan can now be dated up to 30 days after the authorization date?

A. For clarification the assessment and the service/case plan are separate but complementary items. The assessment is a statement that briefly defines the emergency situation and the need for assistance and/or services. The assessment must be completed prior

to or on the date of application. The service/case plan (including items: #1, #2 and #3 from question #18, above) must be completed no more than 30-calendar days from the date of authorization. The service/case plan may be modified during the 30-calendar days following EA authorization. [Note: it is recommended that the service/case plan be completed prior to or on the date of authorization.]

20. Q. Does the CDSS have any suggestions on how to word the service plan so that it will be broad enough to cover subsequent removals and placements under the original episode?
- A. The service/case plan must show that the child and family need assistance and/or services and that the assistance and/or services are necessary to resolve the emergency. Documentation must show that the assistance and/or services claimed were actually provided. ACL 94-90 implemented a child specific eligibility policy effective September 19, 1994. Under the child specific policy, service/case plans no longer need to include language for second or subsequent incidents. Rather, a decision must be made as to whether the subsequent incident is a continuation of the behavior that led to the initial emergency. If the incident is a continuation of the behavior, then it is a continuation of the original episode as long as the county agency has maintained jurisdiction since the initial application was authorized. Documents prepared for the court (e.g., detention reports, pre-plea reports, and dispositional reports) or pursuant to Division 31 of the MPP (e.g., Emergency Response Protocol) will demonstrate that a need(s) exists. Episode summaries are satisfactory for demonstrating that assistance and/or services were provided. However, other documentation, which is maintained as part of routine case recording should be available to provide greater detail in demonstrating the need for and provision of assistance and/or services.

Statistical Report Questions

21. Q. County Welfare Departments (CWDs) are required to get a dollar amount from their corresponding County Probation Department (CPD) for inclusion on the CA 237 report submitted to the CDSS. Is this needed?
- A. This information is no longer required. Counties were informed of this via a letter to CWDs and CPDs from CDSS Information Services dated July 13, 1994. Expenditure information formerly compiled on the CA 237 report is now gathered from county claiming documents.

22. Q. How will the implementation of ACE impact statistical reporting? Now we are required to report on children and families. After implementation of ACE, the "family" now means the "child". What are counties to do?
- A. The implementation of ACE has no direct impact on statistical reporting by counties. The Information Services Bureau of the CDSS issued ACIN I-01-95 which informs counties of changes in statistical reporting requirements as a result of the "child specific" eligibility policy that was implemented on September 19, 1994.

Resource Information Questions

23. Q. Can the CDSS publish a list of ACE Coordinators in each county and update it quarterly?
- A. Yes. Such a listing is under development and will be issued and updated as needed.
24. Q. Some of those attending ACE training have stated that they did not receive advance notification of the training date and time. Can each CWD designate an EA Coordinator who would be responsible for reviewing state material and distributing information as appropriate?
- A. CDSS ACLs, ACINs and County Fiscal Letters (CFLs) are distributed to County Welfare Directors, County Chief Probation Officers, County Fiscal Officers and County Auditor Controllers and will soon be sent to County Mental Health Directors as well. Counties should develop their own internal methods to ensure that needed information reaches affected staff.
25. Q. Is it possible to get a listing of the ACLs, ACINs, CFLs, etc. that govern EA?
- A. Yes, such a list may be obtained by contacting the EA Policy Unit. As of the date of this letter, the following ACLs, ACINs and CFLs have been issued on the EA program:
- ACLs: 93-64 (errata), 94-08, 94-27, 94-35,
94-41, 94-74, 94-89, 94-90, 95-06.
- ACINs: I-37-93, I-41-93, I-15-94, I-16-94,
I-18-94, I-29-94, I-49-94, I-01-95,
I-04-95.
- CFLs: 93/94-04, 93/94-10, 93/94-12, 93/94-13,
93/94-18, 93/94-20, 93/94-21, 93/94-24,
93/94-25, 93/94-35, 93/94-37, 93/94-38,
93/94-40, 93/94-43, 94/95-02, 94/95-06,
94/95-10, 94/95-11, 94/95-21 (errata),
94/95-23, 94/95-26, 94/95-27 (errata),
94/95-32, 94/95-43.

26. Q. Can counties obtain copies of the flip charts used in the ACE training?
- A. The CDSS can supply copies of the original 8.5" x 11" masters from which the flip charts were produced. Contact your EA program analyst for details.
27. Q. Our county has not yet processed an abatement. How do we obtain the abatement forms?
- A. The CDSS does not supply forms for EA. Instead, the EA1 and the EA Assessment/Service Plan (EA2) forms are ordered through the appropriate consortium. Abatement actions within a county are governed by the standards established by the individual county. Abatements between counties are governed by procedures acceptable to each county. An example of an abatement letter for use between counties may be obtained through the Probation Federal Funding Committee. County procedures must be established to ensure that the County Fiscal Officer is notified of the abated episode.

ACE Enhancements

28. Q. Will there be a PF [program function] key to access ACE from the Medi-Cal Eligibility and Data System (MEDS)?
- A. Not at this time. The command "ACEM" is used to access ACE from the MEDS logon. However, the ACE Workgroup will consider this suggestion as a possible future enhancement.
29. Q. Is it possible to have ACE and MEDS cross-check and have alerts or reports generated from the check?
- A. Not at this time. The MEDS and the ACE are separate databases which reside on the same data processing network. Cross-checking between these and other systems will be considered as a possible future enhancement.
30. Q. When will ACE accept batch transactions to update the system in a manner similar to the current MEDS process?
- A. The capability to update ACE by using batch transactions (updates of the system from computer tapes extracted from a county's electronic records) was not included in the basic system design due to elements of time and cost. This capability will be considered as a future enhancement.

31. Q. Can a county obtain a "snapshot" of the ACE records on a 3.5" PC disk to perform matching activities within the county data processing system?
- A. This capability does not now exist. However, this is a recommended enhancement to ACE and should become operational at a later date.

ACE Equipment and Access Questions

32. Q. Some counties have identified a need for more equipment (i.e., MEDS terminals and/or printers) in order to deal with the ACE inquiry and input workload. In addition, some CPDs would like to have MEDS terminals located at their facilities for use in screening applications for activity in other counties. Further, there may be a continuing cost to counties for access to ACE. How are these issues to be addressed by the CDSS?
- A. The CDSS contracted with the California Department of Health Services (CDHS) to develop the ACE system. The costs for the development, enhancement and maintenance of the system will be paid by the various consortia, such as the CCPD for EA Probation, the CWDA for EA CWS and the CCMHD for EA MH. The Health and Welfare Data Center (HWDC) owns ACE equipment and leases it to the counties. The CDSS is developing a mechanism allowing individual counties to order equipment for ACE activities. Requests for ACE equipment should be addressed to the EA Policy Unit. The CDSS will invoice counties for the costs of ACE equipment and access. These charges may be claimed by the counties as EA costs. Access to the ACE database is restricted to the Title IV-A agency performing EA eligibility activities. The Title IV-A agency is the CWD. Requests for ACE equipment and/or access must come from the CWD, not the CPD.

ACE Report Questions

33. Q. All CWD generated transactions to MEDS, including actions to add a record, terminate a record or link a record to another, are reflected on a monthly report generated by DHS to the county MEDS Coordinators. Will the corresponding ACE transactions be included in the monthly series of reports?
- A. No. However, there are separate monthly reports generated by ACE. These are forwarded to the county ACE Coordinator.

34. Q. Can counties obtain a report showing records converted to ACE from the List of Emergency Assistance Participants (LEAPS)? This would be useful in performing clean-up actions on county records.
- A. A consolidated list of converted records is not available. However, a printout of LEAPS records that failed conversion to ACE was transmitted to the county ACE Coordinators on December 29, 1994. The September 1994 ACE reports were distributed to County MEDS Coordinators in early October 1994 (subsequent reports are sent to County ACE Coordinators). These reports reflect all records transferred from LEAPS to ACE as well as those records entered into ACE after the system became operational. Former LEAPS records do not have an authorization date entered in the AUTH DT field and have no component identified in the PGM TYPE field. ACE records successfully converted from LEAPS will reside in ACE until the records expire or are replaced by new ACE records. Counties can use the printout of records that failed conversion along with the September 1994 ACE reports to identify records that were, or should have been, on ACE.
35. Q. Can ACE generate reports showing records pending (i.e., without an AUTH DT) over 30, 60 or 90 days, records deleted by month and records abated by month?
- A. ACE currently generates four reports per month: 1) all records with no date of authorization sorted by program type, child's last name and child's first name; 2) all records with no date of authorization sorted by program type and case number; 3) all records with an NTE date that has not expired sorted by program type, child's last name and child's first name; 4) all records with an NTE date that has not expired sorted by program type and case number. Generation of additional reports will be included as part of the future enhancements to the system. Suggestions for enhancements to ACE should be referred to your county ACE Coordinator. The county ACE Coordinator will forward it to the ACE Work Group for their and CDSS' consideration.
36. Q. In February, 1995, the county received a printout entitled: "LEAPS FILE REPORT" containing about 50,000 names of heads-of-household (HOH) and spouses of HOHs. What is the purpose of the list and are there any instructions for using it?
- A. Under family based eligibility an EA eligible child's (a.k.a., primary service child or PSC) service/case plan may have included assistance and/or services for sibling(s). Subsequent to the design of ACE, the CDSS learned that during the family based eligibility period of the EA program many counties did not enter the names of siblings who were included in an EA eligible PSC's service/case plan into the LEAPS database unless the sibling actually received EA assistance and/or services. Any sibling(s) so

included are considered to have been authorized and had their own EA eligibility consumed, regardless of whether EA assistance and/or services were actually provided. Consequently these siblings are not eligible for EA assistance and/or services until the NTE date of the PSC expires. Because of the design of ACE and that LEAPS did not contain the names of all authorized siblings, an alternative method to ensure that EA was authorized only once in a 12-month period was developed. The only way to determine if a sibling was included in another service/case plan is through the HOH or HOH spouse. The "LEAPS FILE REPORT" is a printout of these HOHs and HOH spouses. The CDSS will issue an ACL and detailed instructions regarding how to conduct a search utilizing the "LEAPS FILE REPORT."

ACE and Social Security Number Questions

37. Q. The child is now considered to be a "family" for purposes of EA. The ACE system tracks persons by Social Security Number (SSN). Must we have an actual SSN for the child in order to create an ACE record, authorize EA and claim assistance and/or services under EA?
- A. ACL 94-90 transmitted information on CDSS policy regarding the need for SSNs. A child, other than an undocumented alien, must have a valid SSN before a final eligibility determination for EA can be made. However, EA can be authorized using PE prior to the receipt of a valid SSN. When creating a record on the ACE system for an EA application, an SSN or a MEDS generated pseudo SSN is required for the child unless the head-of-household has an actual SSN or the child is undocumented. In the latter cases, ACE will generate a pseudo SSN in the MEDS format from the MEDS tables.
38. Q. Under certain circumstances, ACE generates a MEDS pseudo SSN for a child shown on an ACE record. Is there a cross-check with MEDS such that a pseudo SSN used for a MEDS child would be used for the same child in ACE and vice versa?
- A. Presently, there is no cross-check to ensure that the same MEDS pseudo SSN is used in both ACE and MEDS for the same person. ACE does draw the MEDS pseudo SSN from the MEDS tables, ensuring that an individual MEDS pseudo SSN is used only once. However, it is possible to have a child with one MEDS pseudo SSN on ACE and another MEDS pseudo SSN on MEDS. Should counties become aware that a child lacks an actual SSN but does have a MEDS pseudo SSN issued by MEDS (not ACE), this pseudo SSN should be entered in the ACE record. A cross-check as described will be considered as a possible future enhancement to both ACE and MEDS. The CWD does not need to manually cross-check MEDS to find if a child has previously been assigned a MEDS pseudo number.

39. Q. Can a MEDS pseudo SSN (i.e., a MEDS pseudo SSN generated by MEDS or by ACE through the MEDS tables) be entered into ACE?
- A. Counties can enter a MEDS pseudo SSN into the CHILD SSN area as they would an actual SSN. Counties can enter a MEDS pseudo SSN into the HOH SSN area if an actual SSN is not available. However, when the HOH SSN field contains a MEDS pseudo SSN and the CHILD SSN field is blank, ACE will not accept the record unless the child is undocumented.